

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-***
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANTS' MOTION FOR LEAVE TO DEPOSE PLAINTIFF**

COME NOW Defendants Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Michael Knight, Chris Senato, Joseph Atkins, Debbie Melvin, Richard Cockett, Richard Manuel, Wenston White, Steven Raynor, and Bethany Evans (collectively, "Defendants"), by and through their undersigned counsel, and respectfully move this Honorable Court to enter an Order granting Defendants' counsel the right to depose Plaintiff Carl Walker ("Plaintiff Walker"), an incarcerated individual:

1. Plaintiff Walker is an inmate incarcerated at the Sussex Correctional Institution in Georgetown, Delaware.
2. Counsel for the Defendants wishes to depose Plaintiff Walker as part of discovery in this case.
3. The discovery deadline in this matter is April 1, 2008.
4. Fed. R. Civ. P. 30(a)(2) requires leave of the Court to depose an incarcerated individual.
5. A form of order is attached to this Motion that grants Defendants' counsel the right to depose Plaintiff Walker.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their

Motion for Leave to Depose Plaintiff Carl Walker.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi (ID # 3823)  
Deputy Attorney General  
State of Delaware Department of Justice  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400

Attorney for State Defendants

DATE: November 28, 2007

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-***
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**7.1.1 CERTIFICATE OF COUNSEL**

Undersigned counsel hereby certify, pursuant to Local Rule 7.1.1, that:

1. Plaintiff Carl Walker is currently incarcerated and it is not practical for undersigned counsel to communicate with him concerning Defendants' Motion for Leave to Depose Plaintiff.
2. Therefore, undersigned counsel assumes that the Motion is opposed.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi (ID # 3823)  
Deputy Attorney General  
State of Delaware Department of Justice  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400

Attorney for State Defendants

DATE: November 28, 2007

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-***
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2007, I electronically filed *Defendants' Motion For Leave to Depose Plaintiff Carl Walker* with the Clerk of Court using CM/ECF. I hereby certify that on November 28, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi (ID # 3823)  
Deputy Attorney General  
State of Delaware  
Department of Justice  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400

Attorney for State Defendants

***List of Non-Registered Parties***

George A. Jackson  
SBI No.: 171250  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Darus Young  
SBI No.: 282852  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Charles Blizzard  
SBI No.: 166670  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Frank Williams  
SBI.: 261867  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

Roy R. Williamson  
SBI No.: 291856  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Anthony Morris  
SBI.: 300363  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

Carl Walker  
SBI No.: 173378  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Samuel Jones  
SBI.: 465297  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

Darwin A. Savage  
SBI No.: 232561  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Gilbert Williams  
SBI.: 137575  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

Charles B. Sanders  
SBI No.: 160428  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Joseph White  
SBI.: 082985  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

Timothy L. Malloy  
SBI No.: 171278  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Howard Parker  
SBI No.: 165324  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

Kevin Spivey  
SBI No.: 258693  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

James Johnson  
SBI No.: 155123  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Roderick Brown  
SBI No.: 315954  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Roger Thomas  
SBI No.: 292590  
22249 Cabbage Pond Road  
Lincoln, DE 19960

Lawrence B. Dickens  
SBI No.: 124570  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Jerome Green  
SBI No.: 147772  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

Rique Renynolds  
SBI No.: 266486  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

Vernon Truitt  
SBI No.: 188191  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

José Serpa  
SBI No.: 350322  
Sussex Correctional Institution  
Post Office Box 500  
Georgetown, DE 19947

John F. Davis  
SBI No.: 263753  
SCCC  
Route #6, P.O. Box 700  
Georgetown, DE 19947

Eldon Potts  
SBI.: 211193  
Morris Community Corrections  
300 Water Street  
Dover, DE 19901